

Before the  
Federal Communications Commission  
Washington, DC 20554

Received & Inspected

DEC 15 2015

FCC Mail Room

|   |   |                       |
|---|---|-----------------------|
| In the Matter of                        | ) | EB Docket No. 03-152  |
|   | ) |                       |
| <b>WILLIAM L. ZAWILA</b>                | ) | Facility ID No. 72672 |
|   | ) |                       |
| Permittee of FM Station KNKS            | ) |                       |
| Coalinga, California                    | ) |                       |
|   | ) |                       |
| <b>AVENAL EDUCATIONAL SERVICE, INC.</b> | ) | Facility ID No. 3365  |
|   | ) |                       |
| Permittee of FM Station KAAX,           | ) |                       |
| Avenal, California                      | ) |                       |
|   | ) |                       |
| <b>CENTRAL VALLEY EDUCATIONAL</b>       | ) | Facility ID No. 9993  |
| <b>SERVICES, INC.</b>                   | ) |                       |
|   | ) |                       |
| Permittee of FM Station KYAF,           | ) |                       |
| Firebaugh, California                   | ) |                       |
|   | ) |                       |
| <b>H. L. CHARLES d/b/a FORD CITY</b>    | ) | Facility ID No. 22030 |
| <b>BROADCASTING</b>                     | ) |                       |
|   | ) |                       |
| Permittee of FM Station KZPE,           | ) |                       |
| Ford City, California                   | ) |                       |
|   | ) |                       |
| <b>LINDA WARE d/b/a LINDSAY</b>         | ) | Facility ID No. 37725 |
| <b>BROADCASTING</b>                     | ) |                       |
|   | ) |                       |
| Licensee of FM Station KZPO,            | ) |                       |
| Lindsay, California                     | ) |                       |

To: Marlene H. Dortch, Secretary, FCC  
Attn: Richard L. Sippel, Chief Administrative  
Law Judge

OPPOSITION TO ENFORCEMENT BUREAU'S REQUEST FOR  
STATUS CONFERENCE

This Opposition to Enforcement Bureau's Request for Status  
Conference is filed on behalf of the Estate of Linda Ware, Cynthia  
Ramage, Executor, the Estate of H.L. Charles, Robert Willing,

No. of Copies rec'd 0+6  
List ABCDE

Executor, Avenal Educational Services, Inc., Central Valley Educational Services, Inc., and William L. Zawila.

OPPOSITION TO REQUEST FOR STATUS CONFERENCE -

A status conference at this stage of the proceedings in this matter is unnecessary and would serve no useful purpose.

The Request put forth by the Enforcement Bureau itself outlines the current status of this matter in detail.

The said Request by the Enforcement Bureau outlines motions, oppositions, and replies which are currently pending before the presiding officer in this matter concerning discovery and dismissal of this proceeding in its entirety.

A status conference would add nothing to the orderly processing of this proceeding as the current status of this matter is already known by all concerned.

At this juncture, motions, oppositions, and replies are properly pending before the presiding officer for decision.

DENIAL OF DUE PROCESS - RIGHT TO HAVE MOTIONS DECIDED -

The parties to this proceeding are entitled to have the said motions, oppositions, and replies considered and ruled upon by the presiding officer in this matter. (47 CFR §0.341(a) and §0.351(e)).

A status conference is not a substitute for having the said motions, oppositions, and replies properly considered and ruled upon by the presiding officer in this matter.

The parties to this proceeding would be denied due process if they were required to participate in a status conference without having the knowledge of the presiding officer's rulings on the

currently pending said motions, oppositions, and replies. Such rulings would certainly impact the position of the parties at any status conference. In particular, granting of the pending motion to dismiss this proceeding in its entirety would make any status conference moot in this proceeding.

MOTION TO DISMISS THIS ENTIRE PROCEEDING -

In view of the fact that the said motion to dismiss this proceeding in its entirety is well founded on long-standing FCC policy, it is of paramount importance that this motion to dismiss be ruled upon before any status conference is scheduled in this matter.

Granting of the said motion to dismiss would be dispositive of all issues as to all parties as such a grant would dismiss this matter in its entirety.

The parties to this Opposition take note of the fact that the Enforcement Bureau appears to be concerned about the absence of a joinder in the said motion to dismiss by the parties to this Opposition. As noted above, grant of the said motion as currently pending would be dispositive of this matter as to all parties and all issues. However, as an accommodation to the Enforcement Bureau these opposing parties will formally join in the said pending motion to dismiss as soon as possible.

CONCLUSION -

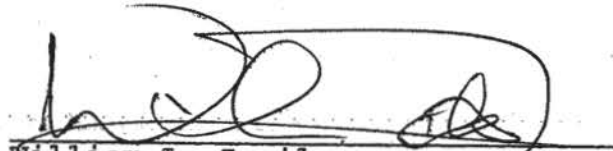
The said Request of the Enforcement Bureau is procedurally out of order and inconsistent with the already known status of this matter as outlined in the said Request itself.

For all of the reasons discussed above, it is respectfully



submitted that the Enforcement Bureau's said Request be denied.

Respectfully submitted,

A handwritten signature in dark ink, appearing to be 'W. L. Zawila', written over a horizontal line.

William L. Zawila  
Attorney for the Estate of Linda Ware,  
Cynthia Ramage, Executor, the Estate  
of H.L. Charles, Robert Willing, Execu-  
tor, Avenal Educational Services, Inc.,  
Central Valley Educational Services,  
Inc., and William L. Zawila  
12600 Brookhurst Street - #105  
Garden Grove, CA 92840  
(714) 636-5040-Telephone  
(714) 636-5042-FAX

12-12-15

CERTIFICATE OF SERVICE

I, William Zawila, hereby certify that a copy of the foregoing  
Opposition to Request for Status Conference By Enforcement Bureau

was served on the following by U.S. First Class Mail, postage  
prepaid, on 12-12-15:

Chief Administrative Law Judge

Richard L. Sippel

FCC

445 12th Street, S.W. - Room 1-C768

Washington, D.C. 20554

Pamela S. Kane, Esquire

Investigations and Hearings Division

Enforcement Bureau

FCC

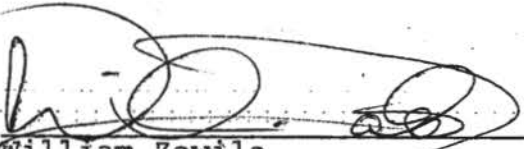
445 12th Street, S.W. - Room 4-C366

Washington, D.C. 20554

Michael Couzens

6536 Telegraph Avenue -Suite B201

Oakland, CA 94609

  
William Zawila